BERKELEY LAB Lawrence Berkeley National Laboratory

Via email and certified mail
Receipt No. 7009 2820 0004 4632 9352 Reference No.: ES-16-014

October 15, 2015

Ms. Carmen Santos and Mr. Steve Armann
Regional PCB Coordinator
US Environmental Protection Agency, Region 9
75 Hawthorne Street
Mail Code: WST-5
San Francisco, California 94105

Subject: Request for Extension of Time Limit for Storage of PCB/Radioactive Waste from Building 5 at the Old Town Project Area

Dear Ms. Santos, Mr. Armann,

The purpose of this letter is to request an extension of the 30-days allowed per 761.65 (c)(1) of Title 40 of the Code of Federal Regulations (CFR) for temporary storage of polychlorinated biphenyl (PCB) waste. The request pertains to PCB/radioactive waste generated during demolition of Room 150 of Building 5 at Lawrence Berkeley National Laboratory's (LBNL's) Old Town Project area. Your approval of this request would allow for temporary on-site storage of this waste for a total of 120 days.

Waste Classification
As previously discussed with the Environmental Protection Agency (EPA), samples of building materials (tape, paint, sealant, and drywall paper) from Room 150 in Building 5 contain PCBs at concentrations greater than 50 milligrams per kilogram (mg/kg). PCBs are not known to have been used in Room 150, and no spills or leaks from equipment or other PCB sources have been documented; therefore, LBNL concludes that the tape, paint, and sealants containing PCBs at concentrations greater than 50 mg/kg had been manufactured with PCBs. As such, these materials are designated as PCB bulk product waste under the Toxic Substances Control Act. The drywall attached to these building materials will also be designated as a PCB bulk product waste. All of the demolition waste from Building 5 is managed as radiologically contaminated and designated as low-level radioactive waste. Low-level radioactive waste with PCB bulk product is designated as PCB/radioactive waste.

Waste Packaging
LBNL's demolition subcontractor Dynamic Management Solutions, LLC (DMS) will package the PCB bulk product waste in one 90-cubic foot B-25 container designed for disposal of low-level radioactive waste. A B-25 container is constructed of 12-gauge low-carbon steel, and its interior and exterior are primed, and the exterior is painted. Such containers meet the general requirements for packaging hazardous materials of 49 CFR Section 173.24, as well as the design requirements of Sections 173.410, and 173.411(A)(B)(1) for Type I Industrial Packaging. For a description of the container and certifications of compliance with the Department of Transportation's requirements radioactive and hazardous waste packaging, please see the enclosed information.

Lawrence Berkeley National Laboratory
One Cyclotron Road | Berkeley, California 94720 | Mail Stop 75B0101 | Tel: 510.486.7614 | Fax: 510.486.6939

Once filled, the container will be sealed under the supervision of a specialist trained in the packaging requirements for radioactive and hazardous waste. The container will be labeled which will include the date the PCB bulk product was removed from service.

Temporary Storage Protective Measures
The sealed container will be stored on the LBNL site in a waste accumulation area designated for temporary storage of demolition waste from Old Town. The area is paved and fenced, and only trained workers are allowed to enter. Inspections of the area are conducted on a weekly basis to ensure all containers are in good condition. Storm drains around the area are protected with storm water control measures to prevent any discharges to the storm drain system.

Basis for Request of Extension of the Temporary Storage Period
To ensure that sufficient time is available to arrange for approval of the waste disposal at a low-level radioactive waste disposal site that is authorized to also accept PCB bulk product waste, LBNL is requesting an extension of the 30-day temporary storage limit for appropriately packaged non-liquid PCB waste set forth in Section 761.65 (c)(1) of 40 CFR.

LBNL requests that the EPA allow temporary storage of the demolition debris in the 90-cubic foot container for up to 120 days. Per Section 761.62 (c) “any person wishing to […] store PCB bulk product waste in a manner other than prescribed in Section 761.65, must apply in writing to the EPA Regional Administrator” and must provide “information indicating that, based on technical, environmental, or waste-specific characteristics or considerations, the proposed […] storage methods or locations will not pose an unreasonable risk of injury to health or the environment.”

As described above, storage of the non-liquid PCB bulk product waste in a sealed and properly labeled B-25 container will prevent any potential for releases of the waste to the environment. Regular inspections of the storage area will ensure that the container remains sealed and in good condition while in storage. Consequently, storage of the waste for additional 90 days will not pose an unreasonable risk of injury to health or the environment.

If you have any questions or require additional information regarding this request please contact Ron Pauer at ropauer@lbl.gov or 510-486-7614 or me, Robert Cronin at RDCronin@lbl.gov or 510-495-2849.

Sincerely,

Robert Cronin
Project Director
Old Town Demolition Project

enclosures:

Lingo Product Sheet for B-25 Container
Lingo Manufacturing Company Container Certification
Lingo Manufacturing Certificate of Conformance

cc via email w/enclosures:

Kim Abbott (kvabbott@lbl.gov)
Steve Armann (armann.steve@epa.gov)
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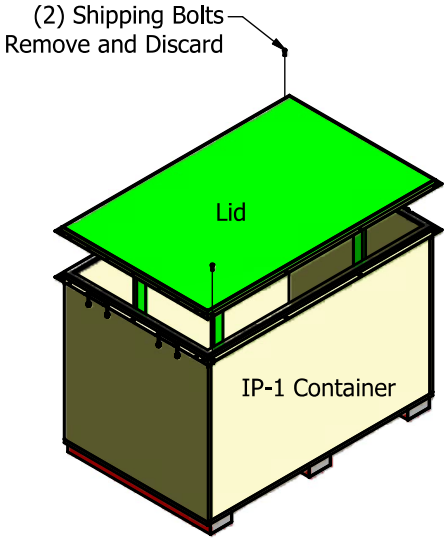
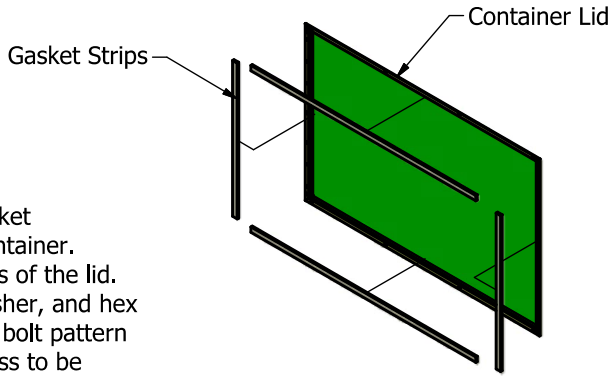
Karen Toth (ktoth@dtsc.ca.gov)
Nancy Ware (NMWare@lbl.gov)

LINGO	0005-IP1 Rev-B	IP-1 Container	Sheet 1 of 1	11/1/2010
	Lingo Manufaturing Co. 7400 Industrial Rd. Florence, Ky 41042 1-800-354-9771		Author: A. Danzl	

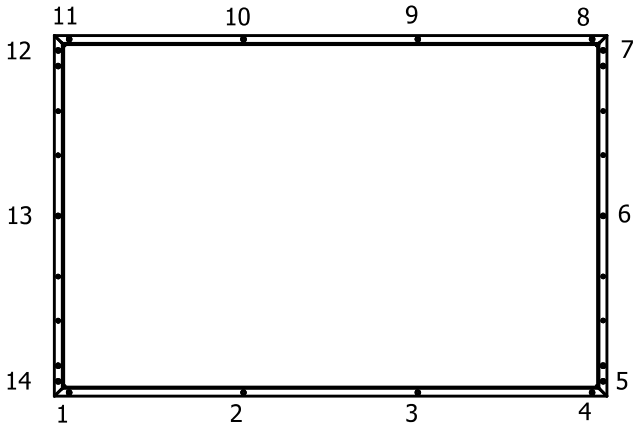


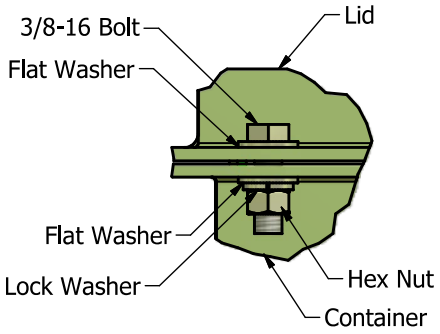
Step 1: Remove and discard shipping bolts

Step 2: Remove Lid and set on its top using 2 persons for safety. Wipe all the dust from the inside edges of the lid to maximize adhesion of gasket material. Select the 20 Ft roll of gasket material placed inside the container for shipment. Cut (2) Pieces 72 1/4" Long and (2) pieces 43 1/4" Long. Remove protective tape to expose the adhesive surface. With a helper - apply the (2) longest strips first. Apply (2) remaining strips - make sure there are no gaps in the joints to assure secure containment.



Step 3: With a helper - lift the lid with the gasket material in place and set carefully on top of container. Install 3/8 Bolt with flat washer to the top holes of the lid. Bottom of bolt will have a flat washer, lock washer, and hex nut as shown. Install all bolts in order with the bolt pattern shown. First pass to be finger tight and 2nd pass to be torqued to 38 Ft lbs with a torque wrench. NOTE: Torque pattern must be followed as shown to assure proper containment.





M&EC
Materials & Energy Corporation

A Subsidiary of Perma-Fix Environmental Services

MEMORANDUM

Engineering

TO: File – LINGO Manufacturing Co., Inc. Container Certification

FROM: Brad Foust

DATE: September 22, 2010

SUBJECT: Engineering Evaluation of DOT IP-1 (manufactured by LINGO)

Refs: (a) DOE/NV-325, Rev. 8 September 2010 Section 3.2.5 "Strength"
(b) Productive Engineering Inc. Container Analysis – IP-1 Structural Analysis Report Rev. 2, Submitted 30DEC09 (Project: 131-531)

1. M&EC requested LINGO Manufacturing Company, Inc. (LINGO) provide 90 cu. ft. DOT IP-1 carbon steel containers (drawing # 25008 Rev. C) with internal structural support and bolted lid closures. To comply with the engineering design requirements per Ref. (a), the supplied finite element analysis (FEA) of uniform loading by Productive Engineering Inc., Ref. (b), have been completed and reviewed by M&EC.
2. In my professional judgment, the manufacturer's drawing package and engineering analysis verify that the packaging design meets the Ref (a) strength requirements and illustrates the ability of the packaging and its contents to support a uniformly distributed load of 16,477 kg/m^2.

Provided by: _____ Date: 9/22/10
Brad Foust (Facility Staff Engineer)

Concur: _____ Date: 9/23/2010
Connie Jones (WCO)

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www.lingomfg.com/metalfab

CERTIFICATE OF CONFORMANCE

Customer: Material & Energy Company

Purchase Order Number: 753435

Specification Drawing: 25008 Rev C

Container Specification: Type IP-1

Serial Number's: 0533 through 0560

Quantity: 28

Lingo Manufacturing Company Inc. certifies that a designated inspector or the Quality Assurance Manager has inspected the above product and that is meets or exceeds the quality requirements identified in the above Purchase Order, Specification and Lingo Mfg's Quality Assurance Program.

The product specified above complies with U.S. DOT 49CFR173.24, 173.410 and 173.411(A)(B)(1).

Mark R. Lingo, President

Mark Lingo
Quality Assurance Manager

Date: 4/29/15

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